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Notice of Service of Process

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Transmittal Number: 14181188
Date Processed: 08/27/2015

Primary Contact: Sara Vanderpool
Acute Care, Inc.
1609 N Ankeny Boulevard
Suite 200
Ankeny, IA 50023

Entity:	Acute Care, Inc. Entity ID Number 1619496
Entity Served:	Acute Care, Inc.
Title of Action:	Judy James vs. Acute Care, Inc.
Document(s) Type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Franklin County Circuit Court, Illinois
Case/Reference No:	15-L-39
Jurisdiction Served:	Illinois
Date Served on CSC:	08/27/2015
Answer or Appearance Due:	30 Days
Originally Served On:	CSC
How Served:	Personal Service
Sender Information:	L. Douglas Gill 618-457-6985

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2711 Centerville Road Wilmington, DE 19808 (888) 690-2882 | sop@cscinfo.com

Exhibit A

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT
FRANKLIN COUNTY, ILLINOIS

JUDY JAMES,)
Plaintiff,)
vs.) Case No. 15-L-39
ACUTE CARE, INC.,)
Defendant.)

SUMMONS

To each defendant: Acute Care, Inc.
C/o Illinois Corporation Service
801 Adlai Stevenson Drive
Springfield, Illinois 62703

You are summoned and required to file an answer in this case, or otherwise file your appearance in the Office of the Clerk of this Court in the Courthouse in Benton, Illinois, within 30 days after service of this summons, not counting the day of service. **IF YOU FAIL TO DO SO, A JUDGMENT OR DECREE BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.**

To the officer:

This summons must be returned by the officer or other person to whom it was given for service, with indorsement of service and fees, if any, immediately after service and not less than three days before the day for appearance. If service cannot be made, this summons shall be returned so indorsed. This summons may not be served later than three days before the day for appearance.

Witness, this 13th day of August, 2015

Nancy Hobbs
Clerk of Court
(Seal of Court) JMC

Hughes Law Firm
P.O. Box 579
Carbondale, Illinois 62903
(618) 457-6985

Date of service: _____, 2015
(To be inserted by officer on copy left
with defendant or other person)

STATE OF ILLINOIS
IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT
FRANKLIN COUNTY, ILLINOIS

JUDY JAMES,

Plaintiff,

vs.

ACUTE CARE, INC.,

Defendant.

)
Case No. 15-L-39

FILED

AUG 11 2015

Nancy Hobbs
FRANKLIN COUNTY
CIRCUIT CLERK

AMENDED COMPLAINT AT LAW

NOW COMES plaintiff, Judy James, by her counsel, L. Douglas Gill of Hughes Law Firm, and for her Amended Complaint at Law against the defendant, Acute Care, Inc., states as follows

1. On July 10, 2013, and at all times relevant hereto, plaintiff was a resident of Orient in Franklin County, Illinois.
2. On said date, and at all times relevant hereto, defendant, Acute Care, Inc., was a foreign corporation organized under the laws of the State of Iowa and doing business at the Franklin Hospital in the City of Benton, Franklin County, Illinois.
3. On said date, and at all times relevant hereto, defendant, staffed and operated the emergency room at Franklin Hospital.
4. On said date, plaintiff was lawfully on the Franklin Hospital business premises.
5. On said date, plaintiff, Judy James, was at the Franklin Hospital emergency room in the visitor waiting area where she had been waiting to go in to see her daughter and a counselor eventually came to notify plaintiff that her daughter was ready to see plaintiff
6. At the aforementioned time and place, plaintiff began to follow the counselor to where plaintiff's daughter was supposed to be and they exited the emergency room waiting area through a door and then turned left to walk toward another door and plaintiff then took a few steps and slipped and fell on the wet floor.
7. The above-referenced condition on Franklin Hospital's property involved an unreasonable

risk of harm to persons, including plaintiff, lawfully on the premises.

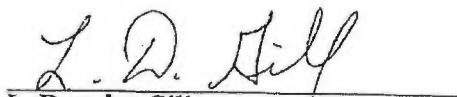
8. Defendant was then and there guilty of one or more of the following negligence acts or omissions:

- a. created, or caused to exist, the aforementioned unsafe condition on its premises;
- b. failed to operate the emergency room in a reasonably safe manner so as to prevent accidents and injury to persons lawfully on the premises;
- c. failed to adequately maintain the premises in a reasonably safe condition;
- d. allowed a slick and slippery substance or substances to be present or to accumulate on the surface of said floor which created an unsafe and dangerous condition for persons lawfully on the premises including plaintiff;
- e. failed to warn or failed to adequately warn, persons lawfully on the premises, including plaintiff, of the aforementioned dangerous conditions;
- f. failed to properly inspect said area where the fall occurred;
- g. failed to safely and adequately staff the emergency room with a sufficient number of personnel;
- h. failed to train its staff on proper procedures to identify and eliminate unreasonably safe conditions and hazards in areas under its management or control.
- i. failed to remove, or failed to properly remove, the slick and slippery build up of water or other substances that accumulated on the aforementioned floor.

9. As a direct and proximate result of one or more of the aforementioned acts or failures to act by defendant, Acute Care, Inc., plaintiff suffered serious and permanent bodily injury that caused her to suffer pain, discomfort, and mental anguish and is reasonably certain to cause her to suffer pain, discomfort, and mental anguish in the future, has suffered permanent or temporary disability or a loss of her normal life and is reasonably certain to experience disability or the loss of her normal life in the future, has incurred great medical and hospital expenses and reasonably may incur additional medical and hospital expenses in the future, has lost time from her usual activities and occupation and experienced a loss of income, all to her detriment and damage.

WHEREFORE, plaintiff, Judy James, prays for judgment against defendant, Acute Care, Inc., in an amount in excess of \$50,000, plus costs of suit and for any other relief this Court deems just and proper.

PLAINTIFF DEMANDS A JURY OF SIX PERSONS



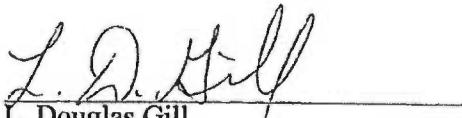
L. Douglas Gill
HUGHES LAW FIRM
P.O. Box 579
1317 West Main Street
Carbondale, Illinois 62903
Tel. No. (618)457-6985
Fax No. (618)529-0188
Counsel for plaintiff

PROOF OF SERVICE

The undersigned hereby certifies that he has caused a true and correct copy of the foregoing paper to be served upon:

Mr. Charles E. Schmidt
Brandon, Schmidt & Goffinet
Attorneys at Law
916 West Main Street
PO Box 3898
Carbondale, IL 62902-3898

by causing the same to be placed in a sealed envelope, clearly addressed as aforesaid, with proper postage fully prepaid, and by depositing same in the United States mail at Carbondale, Illinois, on the 4th day of August, 2015.



L. Douglas Gill
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